

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In Re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO

as representative of

THE COMMONWEALTH OF PUERTO RICO

Debtor

PROMESA

Title III

No. 17 BK 3283-LTS

Jointly Administered

**MOTION FOR JOINER OF OFFICIAL COMMITTEE OF UNSECURED
CREDITORS AND AMBAC INSURANCE CORPORATION'S MOTION FOR
DISCOVERY AS TO THE DISCLOSURE STATEMENT**

TO THE HONORABLE COURT:

COME NOW, Salud Integral de la Montaña, Inc. (SIM), through its undersigned attorney and respectfully states as follows:

1. The Official Committee of Unsecured Creditors (docket 16811) and Ambac Insurance Corporation (docket 16812) filed on May 26, 2021 motions requesting orders on

discovery as to the disclosure statement. SIM joins these motions in the sense that it wishes to have access to the documentation requested in said motion. Sim does not intend to conduct any discovery of its own or even attend depositions and ask questions. It merely wants to have access to the information that is provided in said discovery.

2. SIM joins the UCC's and Ambac's arguments on the importance of information for the consideration of the disclosure statement. Hence, it requests that it be permitted to review any discovery the Court authorizes.

WHEREFORE: SIM requests from the Honorable Court that be allowed to have access to any discovery authorized pursuant to the aforementioned motions. .

Respectfully submitted on this 31st day of May, 2021.

CERTIFY: That on this same day, the ECF system sent a copy of this motion to all parties in this litigation.

/s John E. Mudd
John E. Mudd
Bar Number: 201102
Attorney for Plaintiffs
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